

APPENDIX G
FEDERAL QUALITY SYSTEMS ROLES AND
RESPONSIBILITIES GUIDANCE

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FEDERAL QUALITY SYSTEMS ROLES AND RESPONSIBILITIES GUIDANCE

1.0 Purpose

The purpose of this guidance is to establish general principles for the roles and responsibilities relating to environmental data collection and use at Federal facilities. The guidance was developed for use by those governmental organizations that have adopted the work products (e.g., quality systems policy, quality assurance project plan guidance) of the Intergovernmental Data Quality Task Force (IDQTF). The goals of this appendix are to:

- Define how to oversee implementation of the *Uniform Federal Policy for Implementing Environmental Quality Systems: Evaluating, Assessing, and Documenting Environmental Data Collection/Use and Technology Programs* (UFP-QS) and *Uniform Federal Policy for Quality Assurance Project Plans* (UFP-QAPP) throughout participating organizations;
- Outline how problems between two or more agencies are to be resolved; and
- Clarify the relationship between headquarters organizations (EPA/DoD/DOE) and subordinate or other organizations, for quality systems oversight.

2.0 Scope

Policy and guidance issued by IDQTF (e.g., the UFP-QS and UFP-QAPP) are voluntary consensus documents that become policies, procedures, and specifications when adopted by Federal departments and/or agencies. This Roles and Responsibilities guidance applies to Federal, State, and Tribal organizations and regulatory agencies that adopt IDQTF work products.

This guidance defines roles and responsibilities for implementing IDQTF work products and managing environmental data quality. The initial focus of the IDQTF work products is hazardous waste programs, although the scope may be expanded to address other environmental programs in the future. The specifications in the IDQTF work products are consistent with current EPA quality systems requirements and guidance (e.g., R-2, R-5, and G-5). Nothing in these work products shall be construed to give up any rights of regulatory agencies to oversee environmental management practices or to take necessary enforcement actions.

3.0 Roles and Responsibilities of Major Organizations

The roles and responsibilities described below were developed by the IDQTF based on its evaluation of organizations that currently participate in IDQTF, including EPA, DoD and DOE. Because the organization of other participating departments or agencies may vary, reasonable judgment should be used to assign specified roles and responsibilities according to the intention of

this guidance.

3.1 Intergovernmental Data Quality Task Force

The IDQTF has an ongoing role in the management and oversight of data quality, thereby supporting implementation of IDQTF work products. The roles and responsibilities of the IDQTF include:

- Developing, updating, and revising IDQTF quality systems policy and guidance, as appropriate;
- Promoting and supporting intergovernmental quality systems training and outreach, to encourage the use of IDQTF work products;
- Developing a system for collection and evaluation of information to assess the use and effectiveness of the IDQTF work products;
- Promoting the sharing of quality systems documentation developed by other organizations, provided they comply with the UFP-QS;
- Conducting outreach to, and soliciting participation from, States, Territories, and Tribes, to gain acceptance of the IDQTF work products; and
- Providing assistance in identifying and resolving intergovernmental quality systems implementation issues.

With regard to resolving intergovernmental quality systems issues, the IDQTF can provide assistance in response to requests by participating organizations. Compliance with IDQTF recommendations is voluntary. In general, IDQTF will agree to provide assistance if such assistance adds value to the development or implementation of environmental data quality systems. The following criteria must be met before IDQTF will provide such assistance:

- IDQTF assistance can be provided in a timely manner; and
- The problem represents a systemic problem that, if solved, will assist resolution of similar issues among other organizations.

It is anticipated that issues will be elevated to IDQTF through one of its consensus members. Appendix F to the UFP-QS provides a list of current IDQTF consensus members. Issues submitted for IDQTF assistance must be described in writing. Attachment G-1 provides a form for summarizing issues and will serve as a response mechanism for indicating the IDQTF's intent to provide assistance.

3.2 Environmental Protection Agency

The Environmental Protection Agency (EPA) is comprised of numerous programmatic offices (e.g., Office of Water, Office of Solid Waste and Emergency Response [OSWER]), most of

whom have Regional counterparts. At this point in time, OSWER is the main EPA sponsor of IDQTF work products, with the Quality Staff of the Office of Environmental Information (OEI), the Office of Air, Office of Radiation and Indoor Air (ORIA), and the quality staff and/or hazardous waste management staff of several EPA Regions providing additional support.¹ The EPA section of this appendix is therefore divided into the separate headquarters program offices who have assisted in development of IDQTF work products, as well as a general section on the roles and responsibilities of Regional Offices.

3.2.1 EPA Office of Solid Waste and Emergency Response (OSWER)

OSWER is the program office within EPA that manages the national hazardous waste programs, including Resource Conservation and Recovery Act (RCRA) and Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). In this role, OSWER develops regulations, issues policy and guidance, and plays oversight and technical assistance roles in the implementation of hazardous waste programs in EPA Regions.

OSWER's roles and responsibilities include:

- Continuing to provide the Chair and administrative and technical support for IDQTF, through the Federal Facilities Restoration and Reuse Office (FFRRO) and other OSWER offices;
- Developing, implementing, and maintaining a quality system consistent with the UFP-QS and EPA Order 5360.1, for hazardous waste programs;
- Issuing directives to EPA Regions requiring them to develop quality systems consistent with the UFP-QS;
- Conducting and/or supporting assessments of Regional quality systems;
- Promoting the use of the IDQTF work products by other EPA Program Offices through the Quality and Information Council and other appropriate avenues;
- Supporting the development and funding of intergovernmental quality systems training for EPA, other Federal agencies, States, and Tribes via interagency agreement (IAG) funding, as appropriate;
- Conducting outreach to States, Territories, and Tribes to promote the use of IDQTF work products; and
- Promoting consistency across EPA Regions for the review and approval of quality assurance project plans (QAPPs) consistent with the UFP-QAPP, for hazardous waste programs.

¹Additional offices may sign on and their roles and responsibilities will be added to this appendix at that time.

3.2.2 Office of Environmental Information (OEI)/Quality Staff

The OEI/Quality Staff plays a central leadership role throughout EPA in the development of quality systems policies, procedures, guidance, and programs. The Quality Staff is responsible for issuing quality systems policies, assessing EPA offices for implementation of such policies, and developing quality systems training programs. The roles and responsibilities of the OEI/Quality Staff include:

- Continuing to participate as a Consensus Member in the IDQTF to ensure consistency between IDQTF work products and the EPA Quality System;
- Promoting the use of the UFP-QS and associated work products to other EPA Program Offices through the Quality and Information Council and other appropriate avenues;
- Revising the Agency's quality policies and guidances to ensure consistency with IDQTF work products that have Agency-wide applicability, as appropriate; and
- Promoting IDQTF work products in communications with States, Territories, and Tribes.

3.2.3 EPA Office of Radiation and Indoor Air (ORIA)

ORIA develops protection criteria, standards, and policies; works with other programs within EPA and other agencies to control radiation and indoor air pollution exposures; provides technical assistance to states through EPA's Regional Offices, and to other agencies having radiation and indoor air protection programs; directs an environmental radiation monitoring program; responds to radiological emergencies; and evaluates and assesses the overall risk and impact of radiation and indoor air pollution. The roles and responsibilities of the ORIA Staff include:

- Participating in the development and revision of IDQTF work products;
- Developing, implementing, and maintaining a quality system consistent with the UFP-QS;
- Promoting consistency across EPA Regions for the review and approval of QAPPs consistent with the UFP-QAPP;
- Reviewing and approving QAPPs for environmental data collection operations that are consistent with the UFP-QAPP;
- Supporting the development and funding of intergovernmental quality systems training for EPA, other Federal agencies, States, and Tribes via IAG funding, as appropriate;
- Promoting and supporting the application of the graded approach in developing QAPPs; and
- Conducting outreach to States, Territories, and Tribes to promote the use of IDQTF work products.

3.2.4 EPA Regional Offices

EPA Regional Offices implement environmental programs and oversee environmental programs implemented by others. EPA Regional Offices have the following roles and responsibilities:

- Continuing to participate in the development and revision of IDQTF work products;
- Developing, implementing, and maintaining Regional quality systems, consistent with the UFP-QS and EPA Order 5360.1;
- Conducting self-assessments of Regional quality systems against specifications in the UFP-QS;
- Utilizing the results of the self-assessments to develop plans to correct identified deficiencies;
- Promoting and supporting the development of intergovernmental quality systems training;
- Promoting the use of IDQTF work products to States, Territories, and Tribes;
- Conducting audits of the quality systems of States, Territories, and Tribes;
- Providing assistance to Federal facilities to enhance quality systems performance;
- Reviewing and approving Federal facility QAPPs, including those prepared for sites on the National Priorities List (NPL under CERCLA), consistent with the UFP-QAPP;
- Participating in the site-specific Systematic Planning Process (SPP) at Federal facilities for data collection at non-NPL sites, at the request of other Federal agency installations and field offices or State and Tribal agencies; and
- Promoting and supporting the application of the graded approach in developing QAPPs.

3.3 Other Federal Agencies

Other agencies currently include the Department of Defense (DoD) and the Department of Energy (DOE).²

3.3.1 Headquarters of Other Participating Federal Departments and Agencies

Roles and responsibilities for participating Federal departments and agencies, at the headquarters level, include:

- Continuing to participate as Consensus Members in the IDQTF;

²Additional agencies may sign on and their roles and responsibilities will be added to this appendix at that time.

- Issuing policy and guidance documents to develop, implement, and maintain quality systems consistent with the UFP-QS, beginning with hazardous waste programs;
- Providing review and oversight of UFP-QS implementation throughout the Department/Agency;
- Promoting consistency in UFP-QS implementation throughout subordinate organizations;
- Promoting and supporting the development of, and participation in, intergovernmental quality systems training, as appropriate; and
- Conducting and/or participating in outreach to States, Territories, and Tribes to promote IDQTF work products.

3.3.2 Other Field, Regional, or Subordinate Organizations in Participating Federal Departments and Agencies

Once a Department or Agency has adopted IDQTF work products, subordinate organizations have the following roles and responsibilities:

- Providing support to the IDQTF as requested by the authorized headquarters office;
- Developing, implementing, and maintaining a quality system consistent with the UFP-QS;
- Overseeing the implementation and assessment of quality systems in subordinate organizations;
- Supporting the development of, and participating in, intergovernmental quality systems training, as appropriate;
- Implementing quality systems considerations into planning for all applicable activities and operations related to environmental sampling and testing;
- Promoting the development of and adherence to QAPPs that comply with the UFP-QAPP;
- Conducting the SPP and implementing graded approaches for the collection and use of environmental data; and
- Involving regulators, as appropriate, in the SPP.

Attachment G-1
Form for Issue Submission to the
Intergovernmental Data Quality Task Force

The Intergovernmental Data Quality Task Force (IDQTF) may provide assistance in resolving intergovernmental quality systems issues. The purpose of this form is to provide a brief synopsis of the issue that will allow the members of the IDQTF to assess whether or not they wish to address the issue. The IDQTF retains discretion as to which issues it will address. If the IDQTF decides to play a role in the issue resolution, and more information is necessary, the IDQTF will contact the person who submitted the request for additional information.

Date of Submission

Issue Number
(IDQTF Use Only)

Contact Information

Name, Organization
Phone Number
Email

Issue Statement

In the space provided, describe the issue or issues for which advice is requested. Frame the issue in crisp, clear terms, using questions that pose either/or choices, as appropriate.

**Involved Parties
and Their Positions**

In the space provided, identify the parties who are involved and the positions they have taken. If there are no parties in disagreement, describe who is asking for the advice and why they are asking for it.

Form for Issue Submission to the IDQTF (continued)

Concerns of Involved Parties

In the space provided, describe the concerns that are driving the positions of the parties involved (if the issue is in fact a disagreement).

Background

In the space provided, describe the history or background of the issue. Include facts that will help the IDQTF understand the issue. Include history of attempts to resolve the issue. Cite legal or policy requirements that you believe should play a role in resolution of the issue.

Submit completed form to:

EPA Personnel – FFRRO QA Manager

DoD Personnel – EDQW _____

DOE Personnel – _____

IDQTF Disposition

The IDQTF will either agree to take on an issue or provide a rationale for why an issue will not be addressed. An IDQTF representative will contact the person who submitted the request with the status of the issue resolution.

**Issue Submission to the IDQTF
Tracking Sheet
(IDQTF Use Only)**

Issue Number

Date Received

Responsible IDQTF Member(s)

Primary

Organization

Secondary(if necessary)

Organization

Is additional information required? Yes ☐ No ☐

If yes, describe the type of
information requested.

Date of request

Identify the additional information received.

Document/E-mail/Phone Call	Date Received

The IDQTF can and should provide assistance in resolving this issue? Yes ☐ No ☐

If no, provide rationale.

Provide answer to the
person who submitted
the request.

Date

Issue Submission Tracking Sheet (continued)
(IDQTF Use Only)

Provide dates of meetings or conference calls with IDQTF members and/or parties involved in the issue.

Date	Meeting/CC	Participants

Describe the final IDQTF recommendation.

Provide IDQTF recommendation to the person who submitted the request.

Date